1 Vanessa R. Waldref United States Attorney 2 Eastern District of Washington 3 Michael D. Murphy Assistant United States Attorney 4 402 E. Yakima Avenue, Suite 210 5 Yakima, Washington 98901 (509) 454-4425 6 7 8 9 UNITED STATES OF AMERICA, 10 Plaintiff, 11 12 V. 13 RAYMOND LENARD HOLT, 14 15 Defendant. 16 17 18 19 The Grand Jury charges: 20 21 22 23 24 25 26 27 28

FILED IN THE U.S. DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

## MAY 17 2022

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## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WASHINGTON

1:22-CR-2060-SAB INDICTMENT

> Vio: 18 U.S.C. §§ 1152, 2244(a)(5): Abusive Sexual Contact With a Child, In Indian Country

> > 18 U.S.C. § 2253(a)(2) and (a)(3)
> > Forfeiture Allegations

On a date unknown, but between on or about March 5, 2013, and on or about March 4, 2016, within the external boundaries of the Yakama Nation Indian Reservation, in Indian Country, in the Eastern District of Washington, the Defendant, RAYMOND LENARD HOLT, a non-Indian, did knowingly engage in sexual contact and caused sexual contact with Minor 1, an Indian, to wit, the intentional touching, directly or through the clothing, of the groin, genitalia or

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buttocks of Minor 1, a minor who had not attained the age of 12 years, and such touching was done with an intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person, in violation of 18 U.S.C. §§ 1152, 2244(a)(5).

## NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense(s) in violation of 18 U.S.C. § 2244, as alleged in this Indictment, the Defendant, RAYMOND LENARD HOLT, shall forfeit to the United States any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and, any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property.

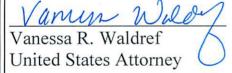
If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

DATED this  $11^{11}$  day of May 2022.



Michael D. Murphy

Assistant United States Attorney